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7 Attorney for Tina Chen

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9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 TINA CHEN,

15 Defendant.

Case No. 2:21-cr-00139-APG-BNW

**SECOND STIPULATION TO  
MODIFY CONDITIONS OF  
PRETRIAL RELEASE**

(Expedited Treatment Requested)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,  
18 United States Attorney, through Jessica Oliva, Assistant United States Attorney, and Matthew  
19 T. Olsen, Assistant Attorney General, National Security Division, Department of Justice,  
20 through Matthew J. McKenzie, Trial Attorney, counsel for the United States of America, and  
21 Rene L. Valladares, Federal Public Defender, and Aden Kebede, Assistant Federal Public  
22 Defender, counsel for Tina Chen, that this Court amend the conditions of Pretrial Release.

23 This Stipulation is entered into for the following reasons:

24 1. On May 27, 2021, the Defendant, Tina Chen appeared before Magistrate Judge  
25 Nancy J. Koppe for an initial appearance and bail hearing. She was released on her personal  
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1 recognizance with pretrial supervision and several conditions. One of the conditions of her  
2 release is a travel restriction that prohibited Ms. Chen from leaving the state of Nevada.

3 2. On July 8, 2022, based on the parties' joint request, this Court amended Ms.  
4 Chen's travel condition to permit her to travel for work within the continental U.S. if approved  
5 in advance by Pretrial Services.

6 3. Now, Ms. Chen has expressed interest to travel to Orlando, FL for a period of  
7 five days, departing the District of Nevada on September 28, 2022 and returning on October 2,  
8 2022. The purpose of Ms. Chen's travel is to visit family friends. Consequently, the parties have  
9 agreed to ask the Court to amend the condition of Ms. Chen's release to reflect her desire to  
10 travel to Orlando, FL.

11 4. Pretrial Services has confirmed her compliance and has no objection to this  
12 modification.

13 5. The parties therefore jointly request to modify Ms. Chen's travel condition to  
14 permit travel to Orlando, FL for a period of five days, departing the District of Nevada on  
15 September 28, 2022, and returning on October 2, 2022.

16 DATED this 15th day of September, 2022.

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18 RENE L. VALLADARES  
19 Federal Public Defender

20 By /s/ Aden Kebede

21 ADEN KEBEDE  
Assistant Federal Public Defender

JASON M. FRIERSON  
United States Attorney

By /s/ Jessica Oliva

JESSICA OLIVA  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3  
4 UNITED STATES OF AMERICA,

5 Plaintiff,

6 v.

7 TINA CHEN,

8 Defendant.

Case No. 2:21-cr-00139-APG-BNW

ORDER

9  
10 ORDER

11 IT IS HEREBY ORDERED, that this Court amend the conditions of Tina Chen's  
12 pretrial release as the parties jointly request that Ms. Chen's travel condition be modified to  
13 permit her to travel to Orlando, FL for a period of five days, departing the District of Nevada  
14 on September 28, 2022 and returning on October 2, 2022.

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16 DATED this 16th day of September 2022.

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21 UNITED STATES DISTRICT JUDGE  
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